

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**KATELYN HANKS**

**v.**

**SOUTHERN KITCHEN CONCEPTS, LLC,  
RJ MEXICAN CUISINE, L.L.C., MARLU  
DAYS LLC, d.b.a. T.G.I. FRIDAY'S and  
MARKET ROSS TX OFFICE OWNER, LLC**

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**CIVIL ACTION NO. 3:18CV01316B**

**AGREED MOTION AND BRIEF TO EXTEND DEADLINE OF  
DEFENDANT MARKET ROSS TX OFFICE OWNER, LLC  
TO FILE ANSWER OR OTHER RESPONSIVE PLEADING OR MOTION**

Plaintiff Katelyn Hanks ("Plaintiff") and Defendant Market Ross TX Office Owner, LLC ("Market Ross") file this agreed motion and brief requesting additional time for Defendant to file its Answer or other responsive pleading or motion as authorized by FED. R. CIV. P. 6(b) and 12.

**A. Introduction**

1. Plaintiff sued Market Ross pursuant to claims under 42 U.S.C., § 12181 *et seq.*
2. On May 24, 2018, Market Ross was served with a copy of Plaintiff's Original Complaint. Pursuant to FED. R. CIV. P. 12, Market Ross's answer and/or responsive pleadings or motions are due on June 14, 2018.
3. Defendant needs additional to review the relevant documents and prepare complete and accurate responsive pleadings.
4. Plaintiff and Market Ross filed this request for an extension as soon as they became aware of the need for additional time and before the deadline for Market Ross's answer or other responsive pleadings.

### **B. Argument**

5. The court may grant a request for extension of time for “cause shown.” FED. R. CIV. P. 6(b).

6. The parties ask the Court to extend the deadline for LINA to answer and/or file responsive pleadings or motions until and including June 28, 2018.

7. The parties have agreed to extend the deadline as reflected by their signatures below. Such extensions will not delay or affect other deadlines. *See* FED. R. CIV. P. 6(b).

### **C. Conclusion**

WHEREFORE, Plaintiff and Defendant Market Ross respectfully request that the Court extend the deadline for Market Ross to file an answer and/or responsive pleadings or motions until and including June 28, 2018 and grant the parties any other or further relief to which they may be legally or equitably entitled.

Respectfully submitted,

/s/ S. Wesley Butler

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ROSS TX OFFICE OWNER, LLC**

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 12th day of June, 2018, the foregoing document was served via the Court's ECF system upon all known counsel of record.

/s/ S. Wesley Butler